Mr. Daniel Stiehl
Venture Corporation
1701 West McDonald Street
Hartford City, IN 47348

Re: 009-15641
First Minor Permit Modification to
Part 70 No.: T 009-6492-00008

Dear Mr. Stiehl:

Venture Corporation was issued Part 70 operating permit T009-6492-00008 on December 28, 2000, for the operation of a stationary plastic automotive parts and components manufacturing plant. An application to add new emission units was received on November 28, 2001. The requested modifications were addressed in the Minor Source Modification No. 009-15314-00008. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to the Part 70 permit is hereby approved to incorporate the new emission units and the applicable conditions, as described in the attached Technical Support Document.

The modification consists of the addition of two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Blackford County
U.S. EPA, Region V
Blackford County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Venture Corporation
1701 West McDonald Street
Hartford City, Indiana 47348

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 009-6492-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: 12-28-2000

1st Administrative Amendment No. 009-9608 Issuance Date: 11-04-1998

1st Minor Permit Modification No. 009-15641	Pages Modified: 5, 24, 25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

(i) Two (2) thermal fluid heaters, identified as HO1 and HO2, constructed in 1985, exhausting to stacks S1 and S2, capacity: 3.1 million British thermal units per hour, each.

(j) One (1) gasket seal oven, identified as OV1, constructed in 1994, exhausting to stack S3, capacity: 0.4 million British thermal units per hour.

(k) Air make up heaters, identified as AH1, constructed in 1985, capacity: 23.25 million British thermal units per hour, total.

(l) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(b) Activities with emissions equal to or less than the significant activity thresholds: fume and mist emissions associated with heat transfer fluid miscellaneous drips from piping or transfer equipment; fugitive dust associated with road traffic or staging area traffic on the stone surface locations; particulate matter (PM_{10}) from the blower exhaust at the vacuum system serving the press building plastic part drilling stations.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) compression molding press, identified as P1, constructed in 1985, maximum capacity: 600 tons.

(b) One (1) compression molding press, identified as P2, constructed in 1985, capacity: 1,500 tons.

(c) One (1) compression molding press, identified as P3, constructed in 1985, capacity: 1,500 tons.

(d) One (1) compression molding press, identified as P4, constructed in 1985, capacity: 1,500 tons.

(e) One (1) compression molding press, identified as P5, constructed in 1985, capacity: 1,500 tons.

(f) One (1) compression molding press, identified as P6, constructed in 1985, capacity: 600 tons.

(g) One (1) compression molding press, identified as P7, constructed in 1997, capacity: 500 tons.

(h) One (1) compression molding press, identified as P8, constructed in 1998, capacity: 1,200 tons.

(i) Two (2) thermal fluid heaters, identified as HO1 and HO2, constructed in 1985, exhausting to stacks S1 and S2, capacity: 3.1 million British thermal units per hour, each.

(j) One (1) gasket seal oven, identified as OV1, constructed in 1994, exhausting to stack S3, capacity: 0.4 million British thermal units per hour.

(k) Air make up heaters, identified as AH1, constructed in 1985, capacity: 23.25 million British thermal units per hour, total.

(l) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Surface Coating [326 IAC 6-3-2(c)] [326 IAC 8-1-6]

The following requirements from previously issued approvals are no longer applicable because the surface coating operations have been removed from this source:

(a) Condition 1 from PC(05) 1581, issued on April 10, 1985, which states that the quantity of surface coating usage and solvent content, as percent VOC by weight, be such that VOC emissions shall not exceed 40 tons per year and a log of information necessary to document compliance with condition 1(a) be maintained.

(b) Condition 5 from OP 05-06-89-0059, issued on July 2, 1985, which states that emissions from the paint spray booths shall not be visibly detectable at the exhaust, be detectable near the exhausts or on the ground, or cause any nuisance problem.

(c) Condition 6 from OP 05-06-89-0059, issued on July 2, 1985, which states that the quantity of surface coating usage and solvent content, as percent VOC by weight, be such that VOC emissions shall not exceed 40 tons per year.

(d) Condition 7 from OP 05-06-89-0059, issued on July 2, 1985, which states that a log of information necessary to document compliance with condition No. 6 be maintained.

(e) Condition 6 from Amendment to OP 05-06-89-0059, issued on February 3, 1988, which states that pursuant to Rule IAC 8-1.1-6, Best Available Control Technology (BACT) shall be air atomization with a VOC limit of 6.0 pounds per gallon of coating, excluding water, delivered to a coating applicator.

(f) Condition 7 from Amendment to OP 05-06-89-0059, issued on February 3, 1988, which states that the quantity of paint usage and solvent content, as percent volatile organic compound (VOC) by weight, be such that the VOC emissions from the surface coating facilities shall not exceed 20.75 tons per month (249 tons per twelve consecutive month period).

(g) Condition 8 from Amendment to OP 05-06-89-0059, issued on February 3, 1988, which states that a daily log of information necessary to document compliance with Condition # 7 be maintained and a quarterly summary of these individual monthly averages shall be submitted by the end of the month following the quarter being reported.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The VOC usage shall be limited such that the VOC emissions at each compression molding press (P1 through P6) shall be less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the potential to emit VOC at each facility shall be less than twenty-five (25) tons per year and the requirements of 326 IAC 8-1-6, New Facilities; General Reduction Requirements, are not applicable.

(b) Any change or modification that increases the potential to emit at any of the remaining molding presses (P7, P8, P9, and P10) to twenty-five (25) tons per year or more shall cause the facility to become subject to 326 IAC 8-1-6, New Facilities; General Reduction Requirements, and prior approval is required.

D.1.3 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the two (2) thermal fluid heaters, with a total heat input capacity of 6.2 million British thermal units per hour, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower

capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Venture Corporation**
Source Location:	**1701 West McDonald Street, Hartford City, Indiana**
County:	**Blackford**
SIC Code:	**3089**
Operation Permit No.:	**T 009-6492-00008**
Operation Permit Issuance Date:	**12-28-2000**
Minor Permit Modification No.:	**009-15641-00008**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed a modification application from Venture Corporation relating to the operation of a stationary plastic automotive parts and components manufacturing plant. The modification relates to the addition of the following emission units:

(a) Two (2) SRIM molding presses, identified as P9 and P10, each with a maximum unit capacity of 30 parts per hour.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 27, 2002.

Emission Calculations

(a) The emissions from the two (2) molding presses was determined in the Minor Source Modification 009-15314. This permit modification will not result in any change in the emissions.

Federal and State Rule Applicability

This permit modification will not result in any change to the federal and state rule applicability already determined. See determination made in the Minor Source Modification 009-15341.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance

requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source stays the same as in the Minor Source Modification No.: 009-15641.

Changes to the Part 70 Permit:

The following are the changes to the Part 70 Permit 011-11925-00037 (~~strikeout~~ to show deletions and **bold** to show additions):

1. The facility description in Section A.2 is modified as follows:

(i) Two (2) thermal fluid heaters, identified as HO1 and HO2, constructed in 1985, exhausting to stacks S1 and S2, capacity: 3.1 million British thermal units per hour, each.

(j) One (1) gasket seal oven, identified as OV1, constructed in 1994, exhausting to stack S3, capacity: 0.4 million British thermal units per hour.

(k) Air make up heaters, identified as AH1, constructed in 1985, capacity: 23.25 million British thermal units per hour, total.

(l) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

2. The facility description in Section D.1 is modified as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS
Facility Description [326 IAC 2-7-5(15)]:

(a).....

(h) One (1) compression molding press, identified as P8, constructed in 1998, capacity: 1,200 tons.

(i) Two (2) thermal fluid heaters, identified as HO1 and HO2, constructed in 1985, exhausting to stacks S1 and S2, capacity: 3.1 million British thermal units per hour, each.

(j) One (1) gasket seal oven, identified as OV1, constructed in 1994, exhausting to stack S3, capacity: 0.4 million British thermal units per hour.

(k) Air make up heaters, identified as AH1, constructed in 1985, capacity: 23.25 million British thermal units per hour, total.

(l) Two (2) SRIM molding presses, identified as P9 and P10, constructed in 2001, each with a maximum unit capacity of 30 parts per hour.

3. The condition D.1.2 is modified as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The VOC usage shall be limited such that the VOC emissions at each compression molding press (P1 through P6) shall be less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the potential to emit VOC at each facility shall be less than twenty-five (25) tons per year and the requirements of 326 IAC 8-1-6, New Facilities; General Reduction Requirements, are not applicable.

(b) Any change or modification that increases the potential to emit at ~~either of the two (2)~~ **any of the remaining** ~~compression~~ molding presses (P7, ~~and~~ P8**, P9, and P10**) to twenty-five (25)

tons per year or more shall cause the facility to become subject to 326 IAC 8-1-6, New Facilities; General Reduction Requirements, and prior approval is required.

4. References to the Office of Air Management (OAM) have been changed to Office of Air Quality (OAQ).